

## YOUNG CONAWAY STARGATT & TAYLOR, LLP

ADAM W. POFF  
DIRECT DIAL: (302) 571-6642  
DIRECT FAX: (302) 576-3326  
apoff@ycst.com

THE BRANDYWINE BUILDING  
1000 WEST STREET, 17TH FLOOR  
WILMINGTON, DELAWARE 19801  
  
P.O. Box 391  
WILMINGTON, DELAWARE 19899-0391

(302) 571-6600  
(302) 571-1253 FAX  
(800) 253-2234 (DE ONLY)  
www.youngconaway.com

January 11, 2007

### **BY ELECTRONIC FILING**

The Honorable Sue L. Robinson  
United States District Court  
844 King Street  
Wilmington, DE 19801


Re: *Boston Scientific Corp. and Boston Scientific Scimed, Inc.*  
*v. Conor Medsystems, Inc.*, 05-768-SLR (D. Del.)

Dear Chief Judge Robinson:

On January 4, 2007, Your Honor instructed BSC to submit twelve redacted Conor documents as a sample of what BSC believes to be Conor's improper redactions. *Sellon v. Smith*, 112 F.R.D. 9, 13 (D. Del. 1986) (party producing should not be the "final arbiter of what is relevant or irrelevant in a particular document."). In response, BSC respectfully submits the following twelve documents as exhibits to this letter: CM 181118-181119 (Ex. A); 184988-185069 (Ex. B); 184778-184815 (Ex. C); 184816-184874 (Ex. D); 184875-184945 (Ex. E); 185279-185292 (Ex. F); 185293-185299 (Ex. G); 185302-185313 (Ex. H); 185342-185355 (Ex. I); 118275-118296 (Ex. J); 10282-10288 (Ex. K); 66153-66159 (Ex. L). Because Conor designated these documents "Confidential — Outside Counsel of Record Only," the exhibits will be delivered by hand to the Court in a separate envelope.

Please note that each exhibit has a first page directing the Court's attention to the redacted pages and indicating the type of relevant information that appears to have been redacted. It is BSC's understanding that Conor will promptly submit unredacted versions of these documents for the Court's review.

Respectfully submitted,



Adam W. Poff (No. 3990)

cc: Clerk of the Court (w/ exhibits by hand delivery)  
Jack B. Blumenfeld, Esq. (w/ exhibits by hand delivery)  
Jared B. Bobrow, Esq. (w/ exhibits by U.S. mail)